

UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND

IN RE: ROBERT LOISEL, Case No.: 12-10404
SHAWNA LOISEL, Chapter 13
Debtors,

OBJECTION TO ALLOWANCE TO AMENDED PROOF OF CLAIM

Now come the Debtors and hereby object to the allowance of the Amendment of Claim Number 2-3 and all amendments thereto claimed by **WELLS FARGO BANK, N.A., AS TRUSTEE, IN TRUST FOR THE REGISTERED HOLDERS OF MORGAN STANLEY ABS CAPITAL I TRUST 2005-HE4, MORTGAGE PASS-THROUGH CERTIFICATES, SERIES 2005-HE4** in the amount of \$269,975.01 on the grounds that said Mortgage has been modified to an amount of \$180,000.00 pursuant to the Debtor's Confirmed and completed Chapter 13 Plan.

Dated: 04/01/2016

Debtors,
By their attorney,

/s/ Edward J. Gomes, Esq.
Edward J. Gomes (2485)
91 Friendship Street, Suite # 3
Providence, RI 02903
401-521-5170 Telephone
401-421-0876 Facsimile

NOTICE OF TIME TO RESPOND/OBJECT

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bankr. P. 9006 if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Bankruptcy Court Clerk's Office, 380 Westminster Mall, 6th Floor, Providence, RI 02903, (401) 626-3100. If no objection or other response is timely filed within the

time allowed herein, the paper will be deemed unopposed and will be granted unless: (1) the requested relief is forbidden by law; (2) the requested relief is against public policy; or (3) in the opinion of the Court, the interest of justice requires otherwise. If you timely file such a response, you will be given thirty (30) days notice of the hearing date for this objection.